

## GOVERNMENT'S LIST OF EXHIBITS

UNITED STATES V. ROSS ROGGIO

JUDGE ROBERT D. MARIANI

No. 3:18-CR-97

MIDDLE DISTRICT OF PENNSYLVANIA

DATE: May 8, 2023

EXHIBIT	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	ADMITTED	SOURCE	WITNESS
1 series	Department of Commerce				
* 1.1	Department of Commerce Hard Drive	5/12/23	<del>NOT</del>	Adm.	Smith
2 series	Department of Homeland Security				
* 2.1	Department of Homeland Security Roggio Border Search Items	5/12/23	<del>NOT</del>	Adm.	Green
* 2.2	C1 Case Files	5/12/23	<del>NOT</del>	Adm.	Green
* 2.3	CF1 Case Files				
3 series	Command Sargent Major Ronald Lee Bly				
3.1	CTG Emblem	5/9/23	Adm.		Bly
3.2	CTG Patch	5/9/23	Adm.		Bly
3.3	Test Fire Video				
3.4	Photograph of Kurdistan's Elite Counterterrorism Group	5/9/23	Adm.		Bly
3.5	WhatsApp Attachment 1	5/9/23	Adm.		Bly
3.6	WhatsApp Attachment 2	5/9/23	Adm.		Bly
3.7	WhatsApp Attachment 3	5/9/23	Adm.		Bly
3.8	WhatsApp Attachment 4	5/9/23	Adm.		Bly
3.9	WhatsApp Attachment Video	5/9/23	Adm.		Bly
3.10	WhatsApp Messages from Roggio to Bly 10.19.16	5/9/23	Adm.		Bly
4 series	Triin Kiviking				
4.1	Messages from Roggio to Kiviking 7.6.15	5/9/23	Adm.		Kiviking
4.2	Messages from Roggio to Kiviking 7.8.15	5/9/23	Adm.		Kiviking

\* Adm. subject to restrictions, not to jury

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4.3	Messages from Roggio to Kiviking 7.11.15	5/9/23	Adm.		Kiviking
4.4	Messages from Roggio to Kiviking 11.3.15	5/9/23	Adm.		Kiviking
4.5	Messages from Roggio to Kiviking 11.4.15	5/9/23	Adm.		Kiviking
4.6	Messages from Roggio to Kiviking 11.18.15	5/9/23	Adm.		Kiviking
4.7	Messages from Roggio to Kiviking 1.4.16	5/9/23	Adm.		Kiviking
4.8	Recording of Roggio 1 12.5.15				
4.9	Excerpt from Recording of Roggio 1	5/9/23	Adm.		Kiviking
4.10	Excerpt from Recording of Roggio 2	5/9/23	Adm.		Kiviking
4.11	Excerpt from Recording of Roggio 3	5/9/23	Adm.		Kiviking
4.12	Excerpt from Recording of Roggio 4	5/9/23	Adm.		Kiviking
4.13	Excerpt from Recording of Roggio 5	5/9/23	Adm.		Kiviking
4.14	Excerpt from Recording of Roggio 6	5/9/23	Adm.		Kiviking
4.15	Excerpt from Recording of Roggio 7				
4.16	Excerpt from Recording of Roggio 8	5/9/23	Adm.		Kiviking
5 series	ATF Industry Liaison Shawn Stevens				
5.1	Firearms Regulation Reference Guide (2005)	5/9/23	Adm.		Stevens
5.2	ATF Acknowledgement of Federal Firearms Regulations Page 3	5/9/23	Adm.		Stevens
5.3	Firearms Special Inspection Report 1.10.08				
5.4	Firearms Special Inspection Report 10.2.08				
5.5	Firearms Special Inspection Report 1.12.09				

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EXHIBIT	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	ADMITTED	SOURCE	WITNESS
5.6	Addendum Report 9.21.09				
5.7	Firearms Special Inspection Report 6.17.10				
<b>6-series</b>	<b>Kristy Roggio</b>				
6.1	Business Entity Details, Roggio Consulting Company, LLC	5/10/23	Adm.		Kristy Meninge
6.2	Search Warrant Execution Video				
6.3	Photograph of Residence, Front	5/10/23	Adm.		Kristy Meninge
6.4	Photograph of Residence, Back	5/10/23	Adm.		
6.5	Photograph of Residence, Vehicle 1	5/10/23	Adm.		
6.6	Photograph of Residence, Vehicle 2	5/10/23	Adm.		
6.7	Photograph of Residence, Vehicle 3	5/10/23	Adm.		
6.8	Photograph of Residence, Vehicle 4	5/10/23	Adm.		
6.9	Photograph of Residence, Vehicle 5	5/10/23	Adm.		
6.10	Photograph of Residence, Gun Room 1	5/10/23	Adm.		
6.11	Photograph of Residence, Gun Room 2	5/10/23	Adm.		
6.12	Photograph of Residence, Gun Room 3	5/10/23	Adm.		
6.13	Photograph of Residence, Gun Room 4	5/10/23	Adm.		
6.14	Photograph of Residence, Gun Room 5	5/10/23	Adm.		
6.15	Photograph of Residence, Gun Room 6	5/10/23	Adm.		
6.16	Photograph of Residence, Gun Room 7	5/10/23	Adm.		
6.17	Photograph of Residence, Gun Room 8	5/10/23	Adm.		

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6.18	Photograph of Residence, Gun Room 9	5/10/23	Adm		Kristy Mering
6.19	Photograph of Parents Residence	5/10/23	Adm		
7 series	Thomas Hall				
7.1	Schematic for Bore Reamer				
7.2	Schematic for Rifle Button				
7.3	Photograph of Rifling Combo Button	5/10/23	Adm		Hall
7.4	Drill Masters-Eldorado Tool, Inc. Sale Order 12.3.15	5/10/23	Adm		Hall
7.5	Drill Masters-Eldorado Tool, Inc. Sale Order Details 1, 12.3.15				
7.6	Drill Masters-Eldorado Tool, Inc. Sale Order Details 2, 12.3.15				
7.7	Drill Masters-Eldorado Tool, Inc. Invoice 1.22.16				
7.8	Drill Masters-Eldorado Tool, Inc. Packing List 1.22.16				
7.9	Drill Masters-Eldorado Tool, Inc. Invoice 2.25.16	5/10/23	Adm		Hall
7.10	Drill Masters-Eldorado Tool, Inc. Packing List 2.25.16	5/10/23	Adm		Hall
8 series	Frank Monteforte				
8.1	DHL Commercial Invoice 1.19.16				
8.2	The Packaging Place Receipt 2.6.16				
8.3	DHL Commercial Invoice 2.8.16				
8.4	The Packaging Place Receipt 3.29.16	5/10/23	Adm		Kristy Mering
8.5	DHL Commercial Invoice 3.30.16	5/10/23	Adm		Frank Monteforte

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9 series	William Mathes				
9.1	Email from Mathes to Roggio 11.5.14				
9.2	Email from Mathes to RGuns 3.10.16	5/11/23	Adm.		Mathes
9.3	Email from Roggio to Viltrop 4.11.16				
9.4	Email from Mathes to Roggio 4.12.16	5/11/23	Adm.		Mathes
9.5	OML Global Invoice 3.28.16	5/11/23	Adm.		Mathes
9.6	FedEx Express Shipping Information 4.25.16	5/10/23	Adm.		Kristy Mering
9.7	YouTube M4 Gun Video				
9.8	YouTube M4 Gun Disassembly Video	5/9/23	Adm.		Blg
9.9	Fort Sill National Bank, Business Records Affidavits				
9.10	Fort Sill National Bank, Statement, 1.22.16				
9.11	Fort Sill National Bank, Statement, 2.23.16				
9.12	Fort Sill National Bank, Statement, 3.22.16				
9.13	Fort Sill National Bank, Statement, 4.22.16	5/11/23	Adm.		Mathes
9.14	Fort Sill National Bank, Statement, 5.23.16				
9.15	Fort Sill National Bank, Statement, 6.23.16				
9.16	Fort Sill National Bank, Statement, 7.22.16				
9.17	Fort Sill National Bank, Statement, 8.23.16				
9.18	Fort Sill National Bank, Statement, 9.22.16				
9.19	Fort Sill National Bank, Statement, 10.24.16				
9.20	Fort Sill National Bank, Statement, 11.22.16				

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9.21	Fort Sill National Bank, Statement, 12.23.16				
10 series	<u>Roger Krah</u>				
10.1	Sportswereus, Inc. DBA R Guns Receipt 4.20.16	5/11/23		Adm	Krah
10.2	M16 Gas Rings	5/11/23		Adm	Krah
10.3	Firing Pins - Retaining Pins	5/11/23		Adm	Krah
10.4	UPS Shipping Receipt 4.22.16	5/11/23		Adm	Krah
10.5	USP Tracking Information 1Z61322X2949468730, 4.22.16	5/12/23		Adm	Burke
11 series	<u>Suzy Abayeva</u>				
11.1	Roggio Consulting Company Employee Agreement 9.5.14	5/10/23		Adm.	Abayeva
11.2	Non-Disclosure Agreement 9.3.14	5/10/23		Adm.	Abayeva
11.3	Counts Kustoms Bikes Final Invoice 2.14.17				
11.4	Photograph of Construction Site 1	5/10/23		Adm.	Abayeva
11.5	Photograph of Construction Site 2	5/10/23		Adm.	Abayeva
11.6	Photograph of Construction Site 3	5/10/23		Adm	Abayeva
11.7	Photograph of Construction Site 4	5/10/23		Adm	Abayeva
11.8	Photograph of Construction Site 5	5/10/23		Adm	Abayeva
11.9	Photograph of Construction Site 6	5/10/23		Adm	Abayeva
11.10	Photograph of Construction Site 7	5/10/23		Adm	Abayeva
11.11	Photograph of Construction Site 8	5/10/23		Adm	Abayeva

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EXHIBIT	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	ADMITTED	SOURCE	WITNESS
11.12	Photograph of Construction Site 9	5/10/23	Adm		Abayeva
11.13	Photograph of Construction Site 10	5/10/23	Adm		Abayeva
11.14	Photograph of Construction Site 11	5/10/23	Adm		Abayeva
11.15	Photograph of Construction Site 12	5/10/23	Adm		Abayeva
11.16	Photograph of Construction Site 13	5/10/23	Adm		Abayeva
11.17	Photograph of Construction Site 14	5/10/23	Adm		Abayeva
11.18	Photograph of Construction Site 15				
11.19	Photograph of Construction Site 16				
11.20	Photograph of Construction Site 17				
11.21	Photograph of Construction Site 18				
11.22	Photograph of Construction Site 19				
11.23	Photograph of Construction Site 20				
11.24	Photograph of Construction Site 21				
11.25	Photograph of Construction Site 22				
11.26	Photograph of Construction Site 23				
11.27	Photograph of Construction Site 24				
11.28	Photograph of Construction Site 25	5/10/23	Adm		Abayeva
11.29	Photograph of Construction Site 26				
11.30	Photograph of Construction Site 27				
11.31	Photograph of Motorcycle 1	5/9/23	Adm		Bly
11.32	Photograph of Motorcycle 2				



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<del>12.33</del>	Photograph of Motorcycle 3	<del>5/9/23</del>	<del>Adm.</del>		<del>Byg</del>
<del>11.34</del>	Photograph of Motorcycle 4				
<del>11.35</del>	Photograph of Motorcycle 5	<del>5/9/23</del>	<del>Adm</del>		
<del>11.36</del>	Photograph of Motorcycle 6				
11.37	Photograph of Motorcycle 7				
11.38	Photograph of Motorcycle 8				
11.39	Photograph of Motorcycle 9				
11.40	Photograph of Motorcycle 10				
11.41	Photograph of Motorcycle 11				
<del>11.42</del>	Photograph of Vehicle, License Plate CTGI	<del>5/10/23</del>	<del>Adm</del>		<del>Mayeva</del>
12 series	<u>U.S. Customs and Border Protection Officer Aurelia Morales</u>				
12.1	U.S. CBP TECS - Secondary Inspection Report, Ross Roggio 2.27.17				
13 series	<u>HSI Special Agent James Mundy</u>				
13.1	DHS Detention Notice and Custody Receipt for Detained Property, Ross Roggio 2.26.17	<del>5/11/23</del>	<del>Adm</del>		<del>Mundy</del>
<del>13.2</del>	DHS Detention Notice and Custody Receipt for Detained Property, Christina Sidropoulou 2.26.17	<del>5/11/23</del>	<del>Adm</del>		<del>Mundy</del>
14 Series	<u>FBI Special Agent Thomas O'Donnell</u>				
14.1	FBI Report, Interview of Ross Roggio 4.29.16				



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14.2	Search Warrant Package, Residence, 3-17-MC-276				
14.3	Redacted Search Warrant Package, Residence, 3-17-MC-276				
14.4	Search Warrant Returns 3-17-MC-276	5/12/23		Adm	Smith
14.5	Wells Fargo Bank, N.A. Statement 11.1.15 - 11.30.15				
14.6	Wells Fargo Bank, N.A. Statement 12.1.15 - 12.31.15				
14.7	Wells Fargo Bank, N.A. Statement 1.1.16 - 1.31.16				
14.8	Wells Fargo Bank, N.A. Statement 2.1.16 - 2.29.16				
14.9	Wells Fargo Bank, N.A. Statement 3.1.16 - 3.31.16	5/12/23		Adm	Salazar
14.10	Discover Certificate of Authenticity of Records of Regularly Conducted Activity 12.14.17				
14.11	Discover Card Statement 11.21.15 - 12.20.15				
14.12	Discover Card Statement 12.21.15 - 1.20.16				
14.13	Discover Card Statement 1.21.16 - 2.20.16				
14.14	Discover Card Statement 2.21.16 - 3.20.16	5/12/23		Adm	Burke
15 Series	Dr. Denise Natali				
15.1	Curriculum Vitae of Denise Natali				
15.2	Expert Report 12.2.22				
15.3	Map of Iraq	5/15/23		Adm	Natali
15.4	Map of Kurdistan	5/15/23		Adm	Natali
16 Series	HSI Special Agent Douglas Green				

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16.1	Curriculum Vitae of Douglas Green	5/12/23		Adm	Green
16.2	Cellebrite Extraction Authentication Report, iPhone 6s, 3.2.17	5/12/23		Adm	
16.3	Cellebrite Extraction Authentication Report, iPad Mini 4, 3.2.17	5/12/23		Adm	
16.4	Cellebrite Extraction Authentication Report, iPhone 6, 3.3.17	5/12/23		Adm	
16.5	Cellebrite Extraction Authentication Report, iPhone 6s, 3.6.17	5/12/23		Adm	
16.6	Cellebrite Extraction Authentication Report, iPhone 6 Plus, 3.7.17	5/12/23		Adm	
17 Series	<u>DOC Special Agent Thomas F. Smith</u>				
17.1	Curriculum Vitae of Thomas Smith				
18 Series	<u>Steven Clagett</u>				
18.1	Disclosure as to Expert Witness Steven Clagett				
18.2	U.S. Department of Commerce Certified License History Request OEE Memo 8.5.22	5/12/23		Adm	Clagett
18.3	U.S. Department of Commerce License Determination Report 5.26.16	5/12/23		Adm.	Clagett
18.4	Attachments to U.S. Department of Commerce License Determination Report 5.26.16				
18.5	Commerce Country Chart 2015				

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18.6	Bureau of Industry and Security, Commerce, CFR 2015, Title 15, Part 744				
<b>19 Series</b>	<b>Alex J. Douville</b>				
19.1	Curriculum Vitae of Alex Douville				
19.2	U.S. Dept of State Memorandum - Identification of Defense Articles, Defense Services, and Technical Data Enumerated on the United States Munitions 7.7.16				
19.3	U.S. Dept of State Memorandum - License and Registration History Check 3.16.17	5/11/23		Adm.	Douville
19.4	U.S. Dept of State Memorandum - Defense Trade Controls Policy Classification 2.12.18				
19.5	U.S. Dept of State Memorandum - Defense Trade Controls Policy Classification 3.30.22	5/11/23		Adm.	Douville
<b>20 Series</b>	<b>HSI Special Agent Jeffrey Burke</b>				
20.1	Search Warrant Package, Yahoo Accounts, 3-16-MC-441				
20.2	Redacted Search Warrant Package, Yahoo Accounts, 3-16-MC-441				
20.3	Search Warrant Package, Yahoo Accounts, 3-16-MC-442				
20.4	Redacted Search Warrant Package, Yahoo Accounts, 3-16-MC-442				

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20.5	Search Warrant Package, Border Search Devices, 3-17-MC-197				
20.6	Redacted Search Warrant Package, Border Search Devices, 3-17-MC-197				
20.7	Search Warrant Return 3-17-MC-197				
20.8	HSI Report, Interview of Ross Roggio 5.10.17				
20.9	Forensic Examination Report				
20.10	End-Use Monitoring and Effective Export Compliance Report 2014	5-12-23		Adm	Burke
20.11	Consultancy Service Contract, Zarya Construction Company Refugee Camp 9.1.14				
20.12	Email from Roggio to Kadaja - Feasibility Report 11.5.15				
20.13	Email from Roggio to Kadaja - Weapons Feasibility Report 11.14.15	5-12-23		Adm	Burke
20.14	Roggio Consulting Company, LLC. Budget Increase Report 3.9.16	5-12-23		Adm	Burke
20.15	WhatsApp Chats Between Roggio and Polad				
20.16	Army Personnel Records for Ross Roggio	5-18-23			Roggio
21-Series	PNC Bank				
21.1	Business Records Declaration 4.14.17	5-11-23		Adm	Foster

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20.17 Email from Roggio to Polad, Test Fire Video negative 5-12-23 Adm Burke

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21.2	Statement, 9.5.14 - 9.30.14	5-11-23		Alm	Foster
21.3	Wire Transaction, 9.26.14				
21.4	Statement, 10.1.14 - 10.31.14				
21.5	Statement, 11.1.14 - 11.28.14				
21.6	Wire Transaction, 11.4.14				
21.7	Wire Transaction, 11.14.14				
21.8	Wire Transaction, 11.18.14				
21.9	Wire Transaction, 11.20.14				
21.10	Wire Transaction, 11.28.14				
21.11	Statement, 11.29.14 - 12.31.14				
21.12	Statement, 1.1.15 - 1.30.15				
21.13	Wire Transaction, 1.16.15 (1)				
21.14	Wire Transaction, 1.16.15 (2)				
21.15	Wire Transaction, 1.27.15				
21.16	Statement, 1.31.15 - 2.27.15				
21.17	Wire Transaction, 2.3.15				
21.18	Wire Transaction, 2.25.15				
21.19	Statement 2.28.15 - 3.31.15				
21.20	Wire Transaction, 3.17.15				
21.21	Wire Transaction, 3.25.15				
21.22	Wire Transaction, 3.30.15				

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21.23	Statement, 4.1.15 - 4.30.15	5-11-23		Qbm	Foster
21.24	Wire Transaction, 4.14.15				
21.25	Wire Transaction, 4.22.15				
21.26	Statement, 5.1.15 - 5.29.15				
21.27	Wire Transaction, 5.7.15				
21.28	Wire Transaction, 5.14.15				
21.29	Statement, 5.30.15 - 6.30.15				
21.30	Wire Transaction, 6.4.15				
21 Series	<u>Wells Fargo Bank, N.A.</u>				
22.1	Business Records Declaration 10.19.16	5/12/23		Qbm	Salaazar
22.2	Business Records Declaration 2.27.23	5/12/23		Qbm	Salaazar
22.3	Statement, August 2015	5/12/23		Qbm	Salaazar
22.4	Statement, September 2015	5/12/23		Qbm	Salaazar
22.5	Statement, October 2015	5/12/23		Qbm	Salaazar
22.6	Statement, November 2015	5/12/23		Qbm	Salaazar
22.7	Statement, December 2015	5/12/23		Qbm	Salaazar
22.8	Statement, January 2016	5/12/23		Qbm	Salaazar
22.9	Wire Transactions Account 1158	5/12/23		Qbm	Salaazar
22.10	Wire Transactions Account 1166	5/12/23		Qbm	Salaazar
23 Series	<u>Zuhair Al-Maliki</u>				
23.1	Curriculum Vitae of Zuhair Al-Maliki				

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23.2	Iraq's Constitution of 2005	5-17-23		Adm.	Al-Maliki
24 Series	<b>Rauno Viltrop</b>				
24.1	Email from H. Viltrop to R. Viltrop, Booking Confirmation Sulay, 9.14.15				
24.2	Email from Viltrop to Kadaja, Job Offer and Employment Agreement, 1.15.16	5-16-23	Page 8 only Adm.		Viltrop
24.3	Email from Roggio to Viltrop, Sales Invoice, 4.11.16	5-12-23		Adm.	Burke
24.4	Email from Viltrop to Roggio, Balance Sheet, 5.1.16			Adm.	Burke
24.5	Video 109-5 - Factory Floor	5-12-23		Adm.	Burke
25 Series	<b>Martin Viliist</b>				
25.1	Google Earth Image, Regional View				
25.2	Google Earth Image, City View				
25.3	Google Earth Image, Main Road Entrance View 1				
25.4	Google Earth Image, Main Road Entrance View 2				
25.5	Google Earth Image, Main Road Entrance View 3				
25.6	Google Earth Image, Main Road Entrance View 4				
25.7	Google Earth Image, Main Road Entrance View 5				
25.8	Google Earth Image, CTG Base	5-12-23		Adm.	Burke
25.9	Google Earth Video	5-15-23		Adm.	Burke
25.10	Video 109-2 - Factory Floor	5-12-23		Adm.	Burke
26 Series	<b>Stim Saar</b>				

X page 2 only admitted (edited in JBS)



## GOVERNMENT'S LIST OF EXHIBITS

UNITED STATES v. ROSS ROGGIO

JUDGE ROBERT D. MARIANI

No. 3:18-CR-97

MIDDLE DISTRICT OF PENNSYLVANIA

DATE: May 8, 2023

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EXHIBIT	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	ADMITTED	SOURCE	WITNESS
26.1	Employment Offer for Roggio Consulting Company LLC 1.22.15	5/17/23	Adm		Saar
26.2	Employment Agreement 1.24.15	5/17/23	Adm		"
26.3	Non-Disclosure Agreement 1.22.15	5/17/23	Adm		"
26.4	Photograph of Factory	5/17/23	Adm		"
26.5	Airline Flight Itinerary for Trip to China 5.16.15				
26.6	Email Confirming Trip to Estonia 10.16.15				
26.7	Passenger Itinerary for Trip to Estonia 12.1.15				
26.8	Illustration of Compound	5/17/23	Adm		Saar
27 Series	<u>Heret Viltrop</u>				
27.1	Messages Between Roggio and Viltrop, Trip to China, 5.17.15				
27.2	Email from Kadaja to Viltrop 6.16.15	5/16/23	Adm		Heret Viltrop
27.3	Attachment to Email Dated 6.16.15, Status of Ordering Machines 6.4.15	5/16/23	Adm		Heret Viltrop
27.4	Messages Between Roggio and Viltrop, Bag at Tallinn Airport, 7.26.15	5/16/23	Adm		Heret Viltrop
27.5	Messages Between Roggio and Viltrop, Siim Airport Ban, 12.8.15				
27.6	Messages Between Roggio and Viltrop, Heret and Siim, 12.5.15				

F1 - Forfeiture Charge

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5/19/23

Adm

O'Donnell